

**Approved by
Resolution of the Board of Directors
Of “Damu” Entrepreneurship
Development Fund” JSC**

**Appendix № 6
To the Minutes of the Meeting of the
Board of Director of “Damu”
Entrepreneurship Development Fund”
JSC of September 27, 2013, № 46**

**CORPORATE SOCIAL RESPONSIBILITY POLICY OF
“DAMU” ENTREPRENEURSHIP DEVELOPMENT FUND” JSC**

**Almaty
2013**

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	corporate social responsibility of "Damu" Fund	
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1. Terms and Definitions

1. In this Policy, the following terms and definitions shall be applied:

Interaction with the stakeholders – procedures and processes implemented by “Damu” Fund for stakeholder involvement in its activities.

Sole Shareholder – Baiterek National Management Holding JSC.

Stakeholders – individuals and legal entities, the exercise of whose rights under the laws of the Republic of Kazakhstan and the Articles of Association is related to activities of “Damu” Fund.

Corporate Social Responsibility – performance of voluntarily assumed obligations and liabilities of “Damu” Fund for the impact its decisions and activities have on stakeholders, society and the environment.

Environment - the natural environment in which “Damu” Fund operates, including air, water, land, natural resources, people and their interrelations.

Reporting on sustainable development (non-financial reporting) – information reflection of activities of “Damu” Fund in the field of corporate social responsibility through the issue of systematic reporting on a spectrum of issues in this policy.

Policy – Policy in the field of corporate social responsibility.

Sustainable development - development that meets the needs of the present without calling into question the ability of future generations to meet their own needs.

“Damu” Fund – “Damu” Entrepreneurship Development Fund” JSC.

2. General Provisions

2. Policy has been developed in accordance with the laws of the Republic of Kazakhstan, the Articles of Association, the Development Strategy of “Damu” Fund in 2012-2022 and other internal regulatory documents of “Damu” Fund.

3. The Policy defines the priorities based on the principles of the UN Global Compact, of which “Damu” Fund is a member, evaluation of the effectiveness and reporting in the field of corporate social responsibility (hereinafter - CSR).

4. “Damu” Fund as the main operator and integrator of the government measures to support entrepreneurship in the Republic of Kazakhstan attaches great importance to the social factors of sustainable development of society and considers social responsibility to be one of the key principles of its activities.

The purpose of the Policy is to ensure that activities of “Damu” Fund in accordance with the corporate social responsibility principles and to strengthen trust relationships with all stakeholders.

The topicality of adoption of the Policy is determined by the need to further enhance the effectiveness of activities of “Damu” Fund in the field of CSR using international norms of conduct and principles enshrined by international standards in the field of CSR and sustainable development.

5. In its activities “Damu” Fund adheres to the following corporate values:

- meritocracy: fairness and objectivity in assessing the contribution and achievements of each;
- integrity: integrity in “Damu” Fund and with its partners;
- openness: openness to contacts and partners;
- trust: commitment to a culture of mutual help and trust.

6. Along with the priority of the observance of rights and interests of the state and the Sole Shareholder, “Damu” Fund voluntarily commits to socially responsible behavior to stakeholders that are affected by its activities: employees, investors, partners, borrowers, suppliers, program participants, public organizations, government agencies and the general public.

7. This Policy applies to all employees of “Damu” Fund, the principles of which must be taken into account when developing internal regulations regarding social matters and stakeholder engagement.

8. Interaction with the Stakeholders

8. In its activities “Damu” Fund is aware of and bears corporate social responsibility to all stakeholders:

- 1) Sole Shareholder;
- 2) Board of Directors;
- 3) Employees of "Damu" Fund;
- 4) Investors, partners, borrowers, suppliers, program participants;
- 5) Public authorities;
- 6) Non-governmental organizations and other legal entities.

9. The process of interaction of “Damu” Fund with stakeholders is based on the engagement principle – respect for the rights of all interested parties to be heard and accountability to them for its actions.

In turn, the involvement is achieved if the following three principles are observed:

- materiality – correct assessment of the significance of concerns of stakeholders and “Damu” Fund;
- completeness – understanding the set of significant effects of “Damu” Fund’s activities and their management, understanding the full range of views and needs of stakeholders in relation to the activity, as well as the ability to influence their expectations and perceptions of the results;
- response – adoption of adequate measures on matters important to stakeholders and “Damu” Fund.

3.1 Interaction with the Sole Shareholder

10. Relationships of “Damu” Fund with the Sole Shareholder are governed by the Articles of Association, the Corporate Governance Code, the Code of Business Conduct, this Policy and other internal documents of “Damu” Fund.

“Damu” Fund, recognizing its responsibility to the Sole Shareholder:

- 1) ensures the exercise of rights of the Sole Shareholder in the framework of the corporate governance principles for effective key decision-making;
- 2) provides accurate information on the results of financial and economic activity in accordance with the current legislation of the Republic of Kazakhstan, the Articles of Association and internal regulations of "Damu" Fund;
- 3) provides additional information about the plans, achievements, activity-related problems, and analysis findings and studies carried out by “Damu” Fund.

3.2 Interaction with the Board of Directors

11. The Board of Directors of “Damu” Fund is a collegial management body, the interaction procedure with which is set out in the Articles of Association, the Corporate Governance Code and other internal regulatory documents of “Damu” Fund.

Implementation of measures for preparation and conduct of meetings of the Board of Directors is provided by the Corporate Secretary in the prescribed manner.

3.3 Interaction with employees

12. “Damu” Fund has an open, transparent personnel policy aimed at the formation of a highly professional, skilled and motivated staff.

“Damu” Fund aims to provide all employees equal opportunities to realize their potential in the workplace, impartial and fair assessment of the results of their work,

recruitment and career development of employees solely on the basis of professional competence, knowledge and skills.

3.4 Interaction with investors, partners, borrowers, suppliers, and program participants

13. Building a relationship with investors, partners, borrowers, suppliers and program participants to support entrepreneurship, “Damu” Fund:

- 1) is guided by the principles of transparency, integrity, respect for the interests of mutual benefit, understanding full responsibility for the liabilities assumed;
- 2) complies with all conditions of the contractual relationship;
- 3) shows respect and honesty in the relationship in accordance with the Business Ethics Code and Corporate Governance Code of “Damu” Fund;
- 4) ensures compliance with generally accepted moral and ethical standards.

3.5. Interaction with public authorities

13. “Damu” Fund and its employees build relationships with government agencies and public officials based on the principles of partnership and respect, knowing that all the initiatives of public authorities and of “Damu” Fund should be directed to the development of the economy and support of private enterprise.

“Damu” Fund is a responsible and conscientious taxpayer.

3.6. Interaction with public organizations and other legal entities

15. Building a relationship with non-governmental organizations (public associations, non-governmental organizations, local communities, media) and other legal entities, “Damu” Fund is actively involved in social processes; implementation of social projects, discussing challenges and prospects of the development of entrepreneurship in Kazakhstan as well as programs aimed at the development of entrepreneurship, and has a positive impact on solving social problems.

16. CSR integration into the management system:

- CSR management is a corporate function;
- managers take into account the social aspect of their work, both in strategic planning and in daily activities.

CSR Corporate Governance implies involvement of stakeholders’ representatives as partners not only at the stage of program implementation, but also at the stage of activities planning and evaluating its effectiveness.

4. Social Responsibility Principles

9. Recognizing the principles of the UN Global Compact ¹, observing the rule of law, “Damu” Fund is guided by the following CSR principles:

¹ The Global Compact is a voluntary initiative aimed at creating a global framework to promote sustainable economic growth and raise the level of civic responsibility through active and creative participation of corporate executives in this process. The idea of the Compact was put forward by the United Nations Secretary-General Kofi Annan at the World Economic Forum in Davos (Switzerland) in January 1999, and the official launch of this initiative was given in July 2000 at the UN headquarters. The Global Compact sets the task of developing corporate social responsibility principles, participation in solving the most pressing problems of society, both at the global and at a local level. It calls on the business community to be guided in its work by ten principles in the areas of human rights, labor, environment and anti-corruption. As part of the agreement, the conditions are created for private sector cooperation with the UN agencies, international labor organizations, non-government organizations and other parties interested in the development of more accessible and fair global market.

4.1 In human rights:

- support and respect for protection of human rights declared internationally;
- ensuring noninvolvement in human rights violations.

4.2 In employment relations:

- support for freedom of association and effective recognition of the right to collective bargaining;
- elimination of all forms of forced labor;
- abolition of child labor;
- elimination of discrimination in employment and occupation;
- ensuring safety and health of workers; carrying out health programs and provision of social support to workers;
- establishing an effective system of motivation and social support for employees training and advanced development of employees;
- formation and development of personnel reserve;
- development of corporate culture;
- implementation of the principle of social partnership.

4.3 In environmental protection:

- support for the approach to environmental issues, based on the principles of precaution and prevention of negative impacts on the environment;
- adoption of initiatives aimed at increasing responsibility for the environment;
- promoting the development and diffusion of environmentally sound technologies;
- supporting initiatives in the use of alternative energy sources, reduced energy consumption and improved energy efficiency.

4.4 In Anticorruption measures:

- opposition to all forms of corruption and other illegal activities, including extortion and bribery;
- adoption of anti-corruption measures (in accordance with the internal regulations);
- adherence to the principles of fair competition;
- opposition to legalization of income received illegally.

4.5 In interaction with the community:

- ensuring the principles of transparency, fairness and accessibility of any information to the public, except for confidential information;
- engage in a dialogue with all stakeholders and communicate effectively on the basis of a balance of interests;
- facilitate/ensure the implementation of government programs to support private enterprise;
- sponsorship and charity;
- timeliness, relevance and effectiveness of implemented social projects;
- maintaining reputation as a responsible taxpayer, contributing to the strengthening of the financial stability of the Republic of Kazakhstan.

4.6 In observance of rights of investors, partners, borrowers, suppliers and program participants:

- compliance with conditions of the signed contracts;
- continuous improvement of standards and quality of services provided to users/customers by “Damu” Fund;
- observance of injunction on the use of confidential information.

18. Key factors for implementation of the Global Compact principles are the following:

- 1) desire to perceive the principles as an integral part of the Development Strategy;
- 2) clear commitment and responsibility from the management of “Damu” Fund;
- 3) informing all employees about obligations assumed by “Damu” Fund in order to ensure broad support for the principles;
- 4) establishment of an environment in “Damu” Fund conducive to the emergence of new ideas and innovative proposals;
- 5) identifying specific targets and establishment of a transparent system of progress reporting;
- 6) willingness and ability of each person to learn and adapt;
- 7) taking practical steps to implement the principles;
- 8) constant readiness of “Damu” Fund and its leadership for a dialogue with stakeholders and effective interaction based on a balance of interests.

5. Primary directions in the field of corporate social responsibility

19. In order to ensure sustainable development, special focus will be placed on the following primary directions in the CSR field:

- 1) effective regulation of social and labor relations on the basis of the social partnership principle;
- 2) establishing a training and development system;
- 3) determining a common policy in the field of social projects implementation;
- 4) identification of a common policy in the area of sponsorship/charity;
- 5) creation of a unified communications strategy.

In order to determine up-to-date directions of CSR on a periodic basis, SWOT and PEST analyzes of “Damu” Fund will be conducted (Appendices 1, 2).

5.1 Effective regulation of social and labor relations on the basis of the social partnership principles

Goal: To provide opportunities for decent and productive work in conditions of equality, safety and respect for human dignity; to carry out an effective HR policy.

Main objectives:

- 1) introduction of an effective assessment and motivation system;
- 2) implementation of social policies consistent with the level of development and capacities of “Damu” Fund;
- 3) reinforcement of the social dialogue, feedback from the workforce, creating the conditions for constructive engagement of stakeholders based on the principles of social partnership;
- 4) implementation of legal literacy improvement system among employees of “Damu” Fund;
- 9) conducting annual research on staff involvement and taking appropriate measures to improve the "level of staff involvement";
- 10) corporate culture development.

An integrated approach to the implementation of this direction will enhance the efficiency of labor, the growth of professionalism of employees, improvement of corporate

culture, and observance and protection of human labor rights in accordance with the requirements of the Labor Code of the Republic of Kazakhstan.

5.2 Development of training and personnel development system

Goal: To increase the level of staff training and development.

Main objectives:

- 1) introduction of workforce planning;
- 2) training and professional development of all employees;
- 3) creation of conditions for innovation.

In order to accomplish this goal, a corporate plan for professional training and development is being developed, as well as the timetable for staff training and development of “Damu” Fund on subjects in the field of CSR (Appendix 3).

5.3 Ensuring environmental sustainability and occupational safety

Goal: To minimize the risk of adverse effects on the environment, health care and organization of safety for employees.

Main objectives:

- 1) environmental friendliness;
- 2) creating a favorable, healthy and safe environment for employees in the workplace;
- 3) compliance with the norms and standards in the field of occupational safety and health.

For the purpose of prudent consumption of paper, consumables and energy resources, “Damu” Fund implements the following: electronic document management system; electronic reporting system; integrated information reporting system (financial and managerial).

An integrated approach to environmental issues will enable “Damu” Fund to not only reduce the negative impact on the environment, but also to reduce overall administrative costs.

Particular attention will be paid to improving energy efficiency, promoting a culture of safe behavior and compliance with safety regulations among the staff.

5.4 Determination of a single policy in the field of social projects implementation

Goal: involvement of the public and businesses in education programs and consulting.

Main objectives:

- 1) collaboration with stakeholders on the principles of partnership;
- 2) creation of an enabling environment for sustainable business development in the long term.

5.5 Determination of a single policy in the field of sponsorship/charitable assistance

“Damu” Fund is guided by the policy of the Sole Shareholder in providing sponsorship/charitable aid, and encourages employee participation in charitable activities on a voluntary basis.

Sponsorship/charity of “Damu” Fund is based on the principles of openness and transparency in the expenditure of funds. Recipients of sponsorship/charitable assistance must provide reports to monitor intended expenditure of allocated funds.

Priority is given to programs and projects that will help position “Damu” Fund as a socially responsible corporate entity at the local, regional, national and international levels.

The main motive for the design and implementation of CSR-related projects and programs should be ensuring an enabling environment for sustainable business development in the long term.

"Damu" Fund does not provide assistance to political parties, or religious institutions or agencies whose activities are aimed at supporting any denomination or religion.

Charitable assistance should aim to solve social problems, and (or) provide support for vulnerable social groups, as well as individual people in difficult circumstances.

5.6. Establishing a single communication strategy

Goal: development of excellent business and social reputation.

Main objective: implementation of image and communication strategy of "Damu" Fund.

Information activities, subject to compliance with the information security requirements, must help improve the image of "Damu" Fund by:

- 1) implementation of PR-strategy;
- 2) informing target audience about strengths and capacities of "Damu" Fund;
- 3) creating positive public opinion;
- 4) ensuring transparency in the activities of the Fund through a reliable, regular, continuous and timely disclosure of information;
- 5) maintaining brand awareness;
- 6) presentation of performance results, as well as analytical studies on major activities of "Damu" Fund to the public.

More open access to information and in-depth coverage of activities of "Damu" Fund will promote a positive image of the Fund as a whole organism with a common mission, values and goals.

In order to successfully implement image-building and communication strategy, and for performance measurement, "Damu" Fund intends to conduct regular quantitative and qualitative reputation research, including performance evaluation of "Damu" Fund.

6. Support to entrepreneurs with disabilities as a priority in the field of corporate social responsibility

20. The priority for "Damu" Fund under the principles of corporate social responsibility is to support entrepreneurs with disabilities.

Improving the situation of people with disabilities is one of the main areas of social policy in Kazakhstan. To date, the priority of social support to people with disabilities is to create legal, socio-economic and organizational conditions for the equalization of opportunities in life activities for persons with special needs, i.e. to have the natural human right to be an integral part of society and to have freedom of choice and freedom of access to employment and training.

In recent years, a positive influence was provided by sustainable economic development and the strengthening of the social orientation of public policies, increase in the level of social protection of the population and, above all, of its socially vulnerable groups, the recognition of new approaches to understanding and solving the problems of the disabled.

Despite the apparent improvement in Social Security for the disabled, the needs of this population group are not completely satisfied, especially with regard to the choices of occupation and vocational training.

An opportunity for people with disabilities to live independently is provided by a possibility of opening and running their own business, which would contribute to the improvement of their material well-being, and hence, integration into society.

Creating conditions to encourage people with disabilities to run businesses requires a set of measures, including implementation of the special “Damu-Komek” program.

“Damu-Komek” program aims to support entrepreneurs with disabilities by raising public awareness of their problems and the resources they need (financial assistance, property, consulting support, and other services). Under this program “Damu” Fund does not provide financing, but it serves as a link between entrepreneurs with disabilities and potential sponsors.

Attracting sponsorship for entrepreneurs with disabilities is carried out through the Program website, where applications can be placed both requesting and offering assistance.

In the process of implementation of the Program, “Damu” Fund will continue to work closely with public organizations of persons with disabilities, financial institutions, foundations, and government agencies.

7. Evaluation of performance in the field of corporate social responsibility

21. Effectiveness of social responsibility depends on careful monitoring, evaluation and verification of the actions taken, achievement of goals at hand, the resources used and other aspects of “Damu” Fund operation.

22. The CSR effectiveness is evaluated by the Board of Directors of “Damu” Fund.

23. Performance evaluation indicators of in the field of corporate social responsibility are the following:

1) involvement and satisfaction of the personnel.

These figures are determined based on the annual staff survey, which includes the following required aspects:

- observance of employees’ rights;
- degree of protection at the workplace;
- employees potential development policy;
- effectiveness of social and other policies pursued.

2) number of young professionals who underwent practical training or internship within “Damu” Fund;

3) number of employees of “Damu” Fund who underwent training;

4) amount of funds in the budget of “Damu” Fund provided for sponsorship/charitable assistance;

5) gross amount spent by “Damu” Fund for sponsorship and charitable assistance to third-party stakeholders;

6) number of complaints of “Damu” Fund employees to Ombudsman due to non-compliance with the Code of Conduct of “Damu” Fund;

7) number of entrepreneurs and people with business initiatives, who were trained and consulted;

8) satisfaction of entrepreneurs with the training and advisory services;

9) number of entrepreneurs with disabilities who received support under “Damu-Komek” program;

10) percentage of local content in the procurement of the Fund;

11) reduced level of energy consumption by “Damu” Fund compared to previous years.

More detailed information about the method of indicator calculation and executive officers of “Damu” Fund for the provision of information about actual indicators’ values is presented in Appendix 4.

8. Progress report on activities in the field of corporate social responsibility

24. In order to implement the areas of activities of “Damu” Fund for the Policy implementation, an annual plan of activities was elaborated for CSR growth, and the report made on execution of activities in the plan to strengthen the CSR. (Appendix 6, 7).

25. Provided reports must meet the following characteristics:

- 1) Clarity: provided in the National - Kazakh, Russian and English languages, free of complicated special terms, taking into account the interests and needs of stakeholders.
- 2) Truthfulness and accuracy: providing useful information that corresponds to the goals set and is accurate, in sufficient detail.
- 3) Balance: containing not only positive information, but also problematic issues and how to address them.
- 4) Timeliness: covering the current period.
- 5) Comparability: reporting in comparison with the previous information.

26. Reports on corporate social responsibility and sustainable development are prepared on a periodic basis following the appropriate structure (Appendix 5) and are posted on the website of “Damu” Fund.

27. In order to introduce a CSR reporting system it is advisable to use such document as Sustainable Development Reporting Guide of the Global Reporting Initiative (GRI Standard²).

The GRI Reporting system is one of the most widely used reporting systems in the field of sustainable development, which includes:

- principles that determine the content of report and ensure the quality of the information provided;
- standard reporting elements, consisting of performance indicators and other characteristics, as well as additional guidance on specific technical issues of reporting;
- basic definitions and guidelines for data collection and compilation of information, as well as other information to assist reporters and to provide a uniform interpretation.

9. Liability

28. Employees of "Damu" Fund are personally liable for failure to comply with the CSR principles, in accordance with the laws of the Republic of Kazakhstan, the Articles of Association and other internal regulations.

² GRI Standard (Global Reporting Initiative) or Global Reporting Initiative is one of the most widely used reporting systems for sustainable development. It was developed in 1997 by the Coalition for Environmentally Responsible Economies and it generates reports based on the "three baskets" or "triple bottom line" principle: economic, environmental and social policy. The reporting method is constantly being improved to ensure compatibility of information provided in non-financial reports and to increase applicability of the standard in organizations operating in different fields.

PEST-analysis form for “Damu” Fund to determine directions in corporate social responsibility

PEST-Factors	Offer Opportunities	Pose a Threat
P – Political and Legal Factors		
E – Economic Factors		
S – Social Factors		
T – Technological and Technical Factors		

SWOT-analysis form for “Damu” Fund to determine directions in corporate social responsibility

S - Strengths	W – Weaknesses
•	•
O – Opportunities	T – Threats
•	•

Time schedule form for training and personnel development of “Damu” Fund by subjects in corporate social responsibility

No	Line of training / Seminar title in the field of CSR	Unit Name / Target Group	Training Duration	Period of Training
1				
n				

Performance review indicators in the field of corporate social responsibility

CSR Lines	Indicators	Calculation Method	Responsible Office
Economic Indicators	Amount of funds in the budget of the Fund provided for sponsorship / charitable aid	Amount of funds in the budget of the Fund provided for sponsorship / charitable aid for the period	Corporate Development Department
	Gross amount spent by the Fund for sponsorship and charitable assistance to third-party stakeholders	Gross amount spent by the Fund for sponsorship and charitable assistance to third-party stakeholders for the period	
	Number of entrepreneurs and people with business initiative, who underwent training and consultations	Number of participants = Number of participants of the 4th direction of "BRM 2020" + number of participants within their own programs	Training and Service Support Department
	Entrepreneurs satisfaction with training and advisory services	Evaluation of entrepreneurs satisfaction with training and provided services will be performed through annual entrepreneurs survey	
	Number of entrepreneurs with disabilities who received support under "Damu-Komek" program	Number of entrepreneurs with disabilities who received support under "Damu-Komek" program for the period	International Cooperation and Remote Consulting Department
	Percentage of local content in the procurement of the Fund	The ratio of the amount of the Fund's procurement of goods, works and services from local suppliers to the total amount of purchases	Administrative Department
Indicators in the work with personnel	Personnel involvement	Assessment of personnel involvement and satisfaction is performed by an annual staff survey	Human Resources Management Department
	Personnel Satisfaction		
	Number of young professionals who underwent practicum or internship within the Fund	Number of young professionals who underwent practicum or internship within the Fund for the period	
	Number of the Fund's employees who underwent training	Number of the Fund's employees who underwent training for the period	
	Number of complaints to the Fund's ombudsmen due to non-compliance with the Business Ethics Code	Number of complaints to the Fund's ombudsmen due to non-compliance with the Business Ethics Code for the period	Corporate Development Department
Environmental Indicators	Reduced energy consumption by the Fund compared to previous years	The ratio of energy consumed during the reporting period to the energy consumed over the previous period	Administrative Department

Structure of the Corporate Social Responsibility Report of “Damu” Fund for the reporting period

Introduction

Section 1. General Information

- 1.1. General Performance Characteristics*
- 1.2. Organizational Structure*
- 1.3. Mission, scope and role of activity in the Republic of Kazakhstan*
- 1.4. Public Evaluation of Performance*

Section 2. Strategic objectives for sustainable development and social responsibility

- 2.1. Social responsibility and partnership*
- 2.1. Indicators for social programs and social assets*

Section 3. Economical Effectiveness

- 3.1. Economic policy and economic indicators*
- 3.2. Kazakhstan Content Indicators*

Section 4. Environmental Performance

- 4.1. Indicators for environmental performance*
- 4.2. Energy Conservation Indicators*

Section 5. Interaction with the Personnel

- 5.1 Indicators for staff development and interaction with the staff*
- 5.2. Social partnership in the field of labor. Collective contractual relationship and interaction with trade unions*
- 5.3. Remuneration and Motivation*
- 5.4. Selection, development, education and training of staff*
- 5.5. Implementation of Housing Policy*
- 5.6. Culture and Sports*
- 5.7. Healthcare*

Section 6. Interaction with the Community

- 6.1. Indicators for investments in the regions*
- 6.2. Indicators for charity and sponsorship*
- 6.3. Tax Payments*
- 6.4. Information Policy*
- 6.5. Figures for the interaction with public authorities, public associations, NGOs, foreign organizations and other stakeholders in the field of social partnership*
- 6.6. Interaction with Suppliers*

Conclusion

**Form of the annual Activity Plan to enhance corporate social responsibility of
“Damu” Fund**

No	Event	Responsible officers	Form of completion	Performance Period	Notes
1					
2					
n					

**Form of the annual Report on Activity Plan to enhance
corporate social responsibility of “Damu” Fund**

No	Event	Planned activities	Responsible officers	Performance Period	Performance information
1					
2					
n					